

UNITED STATES DISTRICT COURT

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT ARKANSAS

JUN 14 2013

EASTERN DISTRICT OF ARKANSAS

JAMES W. MCCORMACK, CLERK
By: SWS DEP CLERK

Gloria A. Bunch, & Family, ET AL
Plaintiff(s)

Case Number: 4:13cv360 BSM

vs.

Kenneth A. Martin, M.D.
Jason Wardell, P.A.
AR Surgical Hospital (ASH), ET AL
Defendant(s)

This case assigned to District Judge Miller
and to Magistrate Judge Young

COMPLAINT

A. Parties

- 1) Gloria A. Bunch, is a citizen of Eagan, MN
(Plaintiff) (State)
who presently resides at P.O. Box 21096 Eagan, MN 55121
(mailing address if different from residence)
- 2) Defendant Kenneth A. Martin, MD is a citizen of Pulaski, CO.
Jason Wardell, P.A. (Name of first defendant) (City, State)
and is employed as Medical Ortho Doctor and Physician Assistant
(Position and title, if any) (Jason Wardell)
- 3) Defendant AR Surgical Hospital is a citizen of North L.R. AR
(Name of second defendant) (City, State)
and is employed as Surgical Hospital - Risk Management
(Position and title, if any)

[You may attach additional pages (8½" x 11") to furnish the above information for additional defendants.]

B. Jurisdiction

- 1) Jurisdiction is asserted pursuant to:

Guilt of All of the Following pursuant to Ark. Code Ann.
§ 17-95-103 (Negligence, Standard of Care, Failure To Tx, Abandonment,
Falsified Records, Failure To DX, Intentional/Willful Misleading to have an
unnecessary surgery for a Bakers cyst, Malpractice Direct Evidence...

- 1) Briefly state the background of your case:

Dr. Martin & Jason Wardell, P.A. are guilty of operating beyond the standard of care, Endangerment, Failure To properly diagnose, Failure To Inform of Risk(s), Carelessness, Failure To Refer, Falsified Medical Records, Negligence, Aiding & Abetting, Intentional & Willful Misleading me to have an unnecessary surgery, Abandonment, Wreckless Surgery leading to a Revision surgery, Permanent Damages (Inability To Walk, Use Leg, Lift leg), Chronic Pain, RSD, Permanent Complications... NO LIFE or Quality of LIFE...

I allege the following:

1.

SEE: Brief

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

SEE: Medical Documentation.

2.

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

SEE: Medical Documentation.

3.

Supporting Facts: (Include all facts you consider important, including names of persons involved, places and dates. Describe exactly how each defendant is involved. State the facts clearly in your own words without citing legal authority or argument.)

SEE: Brief

[If necessary, you may attach additional pages (8½" x 11") to explain any allegation or to list additional supporting facts in the same format as above.]

E. Request for Relief

I believe that I am entitled to the following relief:

\$ 77.7 Million Dollars Punitive Damages, All Medical Bills/School Loan Bills Paid in Full; Compensatory Damages in the amount of \$ 50.7 Million Dollars with Interest and Paid Gloria A. Bunch Taxes on All monetary Relief. All Licenses to be Revoked Permanently. Note: There is No Amount of Money that could take Away the Pain or give me My LIFE back...

Original Signature of Plaintiff

Gloria A. Bunch

Current Address

P.O. Box 21096

City

Eagan

State

MN ZIP

55121

501) 613-8778

Gloria A Bunch
501) 613-8778

Telephone

Dr. Kenneth Rosensweig, Gordon Newbern, CNP of Jason Stewart, Dr. Jason Stewart, UAMS School of Orthopedics, Ark. Surgical Hospital (ASH) are All guilty of Medical Malpractice, Medical Negligence, Abandonment, Neglect, Fraud, Aiding & Abetting, Failure To Inform of Risk(s), Failure To Refer, Carelessness, Operating beyond The Standard of Care, Failure to DX, Intentional/Willful Misleading to have an unnecessary TKR Surgery for a "Baker's Cyst", Wreckless, Endangerment, Permanent Damages (Inability To Walk, Put Any Weight on (L) Leg / Unable To Lift/Extend Leg, Chronic Pain, RSD, Permanent Injuries, No Quality of Life, Failure To TX and All other Medical Malpractice complications). All Doctors/Hospital Aided & Abetted to help conceal unlawful Medical Malpractice and/or give me the proper Medical Attention that I needed so desperately when I hurt to the point that I begged God daily to just let me DIE and was suicidal daily due to the inhumane, malicious, vindictive injustice to help (UAMS - Strive School Based Program) to also conceal or hostile and Inhumane/Employment Discriminations Claims against UAMS and Veterans' Administration whom I previously worked for and wrongfully terminated.

Social Security Administration

Date: April 4, 2013

Claim Number: XXX-XX-2934A
XXX-XX-2934DI



1BEV010004405 0.345 MB 0.405 T00000016



GLORIA BUNCH
1455 UPPER 55TH ST E
APT 208
INVER GROVE HEIGHTS MN 55077-1530

You asked us for information from your record. The information that you requested is shown below. If you want anyone else to have this information, you may send them this letter.

Information About Current Social Security Benefits

Beginning December 2012, the full monthly Social Security benefit before any deductions is \$ 1194.60.

We deduct \$104.90 for medical insurance premiums each month.

The regular monthly Social Security payment is \$ 1089.00.
(We must round down to the whole dollar.)

Social Security benefits for a given month are paid the following month. (For example, Social Security benefits for March are paid in April.)

Your Social Security benefits are paid on or about the third of each month.

Information About Past Social Security Benefits

From December 2011 to November 2012, the full monthly Social Security benefit before any deductions was \$ 1174.70.

We deducted \$99.90 for medical insurance premiums each month.

The regular monthly Social Security payment was \$ 1074.00.
(We must round down to the whole dollar.)

Information About Supplemental Security Income Payments

Beginning March 2002, the current Supplemental Security Income payment is \$ 0.00.

This is after we have withheld 241.00 to recover an overpayment.

See Next Page



XXX-XX-2934A
XXX-XX-2934DI

Page 2 of 2

This payment amount may change from month to month if income or living situation changes.

Supplemental Security Income Payments are paid the month they are due. (For example, Supplemental Security Income Payments for March are paid in March.)

Payments were stopped beginning August 2007.

Date of Birth Information

The date of birth shown on our records is April 20, 1963.

Medicare Information

You are entitled to hospital insurance under Medicare beginning September 1999.

You are entitled to medical insurance under Medicare beginning September 1999.

Type of Social Security Benefit Information

You are entitled to monthly disability benefits.

If You Have Any Questions

If you have any questions, you may call us at 1-800-772-1213, or call your local Social Security office at 866-964-7341. We can answer most questions over the phone. You can also write or visit any Social Security office. The office that serves your area is located at:

SOCIAL SECURITY
SUITE 100
6161 AMERICAN BLVD W
BLOOMINGTON, MN 55438

If you do call or visit an office, please have this letter with you. It will help us answer your questions.

Social Security Administration

	GROSS MONTHLY ANNUITY		MONTHLY HEALTH BENEFITS		MONTHLY MEDICARE		OTHER DEDUCTIONS OR ADDITIONS		NET MONTHLY PAYMENT	
	AMOUNT		AMOUNT		AMOUNT		CODE	AMOUNT		
OLD STATUS							LI	-1.95		
							19	-6.85		
							46	-18.53		
							42	-89.46		
							43	-9.16		
	1247.00		-121.88				31	-43.46		955.71
NEW STATUS							LI	-1.95		
							19	-6.85		
							46	-18.53		
							42	-89.46		
							43	-9.16		
	1269.00		-121.88				31	-45.66		975.51

*SEE BACK FOR CODES FOR OTHER DEDUCTIONS OR ADDITIONS
 UNITED STATES OFFICE OF PERSONNEL MANAGEMENT
 RETIREMENT OPERATIONS CENTER
 PO BOX 45
 BOYERS PA 16017-0045

YOUR PAYMENT DATED: 01/02/2013

REFER TO
THIS NUMBER
WHENEVER YOU
CONTACT OPM

CLAIM NUMBER

CSA 8 374444 0

Reason for adjustment.

You may use this notice as proof of your current rate of annuity.

YOUR NEW GROSS MONTHLY ANNUITY REFLECTS A 1.7%
 COST-OF-LIVING ADJUSTMENT. BY LAW, THE INCREASE IS
 ROUNDED DOWN TO THE NEXT WHOLE DOLLAR.

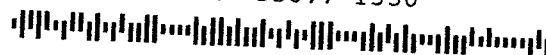
THE AMOUNT OF FEDERAL INCOME TAX WITHHELD FROM YOUR
 ANNUITY HAS CHANGED.

EFFECTIVE JANUARY 1, 2013, YOUR MONTHLY HEALTH
 BENEFITS PREMIUM FOR PLAN 111 WILL BE \$127.99.
 IF THE HEALTH BENEFITS PREMIUM SHOWN IN THIS MESSAGE
 IS THE ONLY CHANGE AFFECTING YOUR FEBRUARY 1 PAYMENT,
 YOU MAY NOT RECEIVE A SEPARATE NOTICE OF ANNUITY

To call our toll-free number, dial 1-888-767-6738 (TDD 1-855-887-4957).

004245104*4501*28536-01

GLORIA A BUNCH
 APT 208
 1455 UPPER 55TH ST E
 INVER GROVE MN 55077-1530



245104

245104

245104



March 27, 2013

Dear Judge:

I am a clinical psychologist writing this letter at the request of Gloria Bunch whom I had worked with Gloria Bunch from 11-14-11 to 1-26-13 to treat her depression and posttraumatic stress disorder. The issue addressed in this letter pertains to her limited economic resources and competency to represent herself in court. In my opinion, the physical pain and anxiety she experiences, along with the complexity of the legal matters she is dealing with, would compromise her ability to represent herself in court. It is my hope that the court would assist Ms. Bunch in securing legal representation.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in cursive script that reads "Robert J. Havel".

Robert J. Havel Psy.D
Licensed Psychologist



MINNESOTA
MENTAL
HEALTH
CLINICS

July 18, 2012

Mark Roos
Dakota County Adult Services

Dear Mr. Roos,

This letter is written on behalf of Gloria Bunch who I have been seeing since 11-14-11 for individual psychotherapy. She has been diagnosed with major depressive disorder as well as posttraumatic stress disorder. Her case has been complicated by psychological losses and trauma while she was living in Arkansas and Texas associated with her work and with physical impairment, and chronic pain resulting from failed orthopedic procedures. This has left her with significant loss of mobility and function, contributing to her depression. Gloria is facing eviction from her son whom she has been living with since she moved from Oklahoma. She has found an apartment at Salem Green in Inver Grove Heights with a heated indoor pool which would be an ideal location from which to meet her orthopedic needs and treat her chronic pain. I am also requesting PCA services to help maintain her independence and, if possible, financial assistance for rent and deposit.

Thank you for your time and consideration.

Sincerely,

Robert J. Havel Psy.D.
Licensed Psychologist

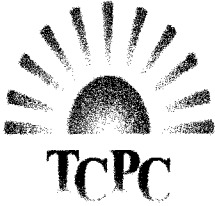


Minnesota
Mental Health Clinics

Robert Havel, Psy.D., L.P.
Licensed Psychologist

3450 O'Leary Lane, Eagan, MN 55123
Appointments: (651) 454-0114
Voice Mail: (651) 365-8207

Minnesota Mental Health Clinics Eagan Clinic-3450 O'Leary Lane, Eagan MN 55123 Phone: 651-454-0114 Fax: 651-454-3492
Edina Clinic- 6525 Drew Ave. So. Edina, MN 55435 Phone: 612-746-5888 Fax: 612-746-5518
Lakeville Clinic-18586 Joplin Ave., Lakeville, MN 55044 Phone: 952-435-8700 Fax: 952-435-0599
Southwest Minneapolis Clinic-5346 Lyndale Ave. So., Minneapolis, MN 55419 Phone: 612-746-5888 Fax: 612-746-5518
Maplewood Clinic 2785 White Bear Ave. Suite 403 Maplewood, MN 55109 Phone: 651-779-0069 Fax: 651-779-0206
Woodbury Clinic-1000 Radio Dr. Suite 210, Woodbury, MN 55125 Phone: 651-365-8209 Fax: 651-739-0272



Twin Cities Pain Clinic
Physician directed pain management & physical therapy

7235 Ohms Lane
Edina, MN 55439

Tel: (952) 841-2345
Fax: (952) 841-2346
www.twincitiespainclinic.com

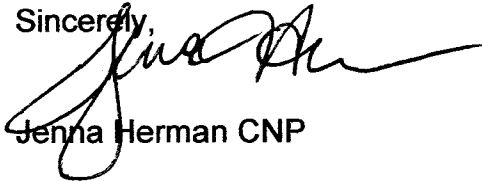
May 01, 2013

RE: Gloria Bunch
DOB: 04/20/1963

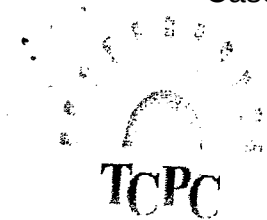
To Whom it May Concern:

Gloria Bunch is a patient at this clinic. Please allow patient to keep her file open and give patient more time to meet her deadlines due to her ADA status as patient has chronic pain and unable to walk. Contact clinic for further questions.

Sincerely,



Jenna Herman CNP



7235 Ohms Lane
Edina, MN 55439

Twin Cities Pain Clinic

Physician directed pain management & physical therapy

Tel: (952) 841-2345
Fax: (952) 841-2346
www.twincitiespainclinic.com

January 14, 2013

RE: Gloria Bunch
DOB: 04/20/1963

To Whom it May Concern:

Gloria Bunch is a patient at this clinic. Patient receives narcotic pain medication from this clinic for her chronic pain. Common side effects include drowsiness and decreased concentration which may affect patient's ability to concentrate or answer questions. Please contact clinic with questions.

Sincerely,

Jenna Herman CNP